

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

<b>In the Matter of</b>	)	
	)	
<b>Amendment of Part 97 of the Commission's</b>	)	<b>RM-10807</b>
<b>Amateur Service Rules to Eliminate</b>	)	
<b>Morse Code Testing</b>	)	
	)	
<b>To: The Commission</b>	)	

**COMMENTS TO THE PETITION**

**Concerning the Morse Code**

I disagree with the petition inasmuch as the petitioners seem not to understand the reason for Morse testing and why it is or is not of relevance to the Amateur Service. The retention of Morse Code testing for any class of Amateur Radio license serves no apparent purpose, and all such testing should be eliminated at the earliest opportunity. As has been pointed out by others, the only reason a Morse exam was required at all was so that amateur radio operators could understand instructions from government stations to cease operating if they were interfering with traffic involving safety or other critical communications, and only then because everyone, amateur and commercial, was using spark transmitters. Spark is gone, thousands of stations can operate at the same time without interference, and the military no longer needs the services of thousands of trained Morse code operators.

**Concerning Consolidation of License Classes and other exam issues**

I am in partial agreement with the petitioners comments concerning consolidation of license classes, but disagree with their comments about the relative degree of difficulty for various exam elements and the number of questions that should be on each exam. They also do not address the issue of a better way to get newcomers into the ranks of licensed amateur radio operators. I believe a totally new approach to the entry level license is warranted, instead of a rehash of 50 year old ideas. Such a proposal is being developed, and will be submitted when ready.

Their suggested method for scoring exams, particularly telegraphy exams, is extremely cumbersome and subject to human error. A similar objection occurs concerning credit for CSCE's issued by a VEC. In every case, I maintain that the present method of giving examinations is sufficient to attain the desired goal, and that no changes are necessary. The purpose of an examination should be to ascertain that the applicant has a sufficient understanding of the legal and technical issues that are needed to insure he or she is able to operate his or her

equipment efficiently and without causing interference to other services. The purpose of an examination is decidedly not to create an engineer or expert in radio law.

### **Skills will be acquired when needed**

As with any number of other skills, if an operator in the Amateur Radio service finds he or she has a need for the advantages offered by use of Morse code transmission, they will undertake to learn the skills required. It is obvious that Morse code transmissions have a clear advantage over other modes in certain situations. However, there remains no legal or technical reason for applicants to demonstrate the skill as a prerequisite to obtaining a license, at whatever level. Morse code is a skill, nothing more. Those with interest and a reason to learn the code will do so. Other individuals who have no interest in the mode gain nothing by being forced to learn or demonstrate a skill for which they have no use.

### **Personal information**

I joined the ranks of Amateur Radio licensees with a Novice license in 1959, and have been licensed continuously since that time. I have held an Amateur Extra Class operator license since August of 1976. I have also held a FCC Commercial radio operator license since 1963, originally a First Class Radiotelephone, with Ship Radar and Aircraft endorsements, it was modified to a General Radiotelephone Operators License when all such licenses were converted several years back. I am a life member of the American Radio Relay League (ARRL) and the Vice Chairman of the National Conference of Volunteer Examiner Coordinators (NCVEC).

Respectfully submitted,

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